

Atlantic Richfield Company

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December 4, 2009

CERTIFIED – RETURN RECEIPT REQUESTED

Ms. Nadia Hollan Burke
Remedial Project Manager
U.S. Environmental Protection Agency Region 9
75 Hawthorne Street, SFD-8-2
San Francisco, CA 94105

Subject: November 2009 Monthly Report, Yerington Mine Site, Lyon County, Nevada: Administrative Order for Remedial Investigation and Feasibility Study, EPA Docket No. 9-2007-0005; Administrative Order on Consent, EPA Docket No. 09-2009-0010

Dear Ms. Hollan Burke:

Pursuant to the above referenced orders issued by the U.S. Environmental Protection Agency – Region 9 (EPA), please note the following monthly status report for Atlantic Richfield Company (ARC) RI/FS and removal action activities at the Yerington Mine Site (Site) during November 2009.

November 2009 Activities

Operations, Maintenance and Site Security

- Continued routine Site O&M, security and bird deterrent activities including operation of the propane cannons for the Arimetco ponds with the exception of the VLT Pond, as directed by EPA. The bird guard towers have stayed active due to precipitation remaining on the ponds from the last rain event.
- An injured loon was found on the EPA Pond. After having stayed on the pond for about three days, it died on November 13. Wayne Bull, representing the USFWS, took control of the situation on November 11 and harvested the carcass on November 13.
- PWS evaporation pond levels: North Cell 0 feet; Middle Cell = <0.1 feet; South Cell 0.28 feet. Uncorrected pan evaporation for the month of November was 3.00 inches; the Site received 0.33 inches of precipitation during the month.
- Arimetco heap leach fluid management system (FMS): 1) total estimated gallons transferred from VLTSP Pond to Evaporation Pond = 0 gallons; slot sediment pond (SSP) to Evaporation Pond = 0 gallons. Phase 1 Pond to Evaporation Pond = 0 gallons; 2) Pond levels: Phase 1 Pond = 1.0 foot; Evaporation Pond = 5.75 feet; VLT Pond = 8.0 feet; Slot 2 Pond = 14.75 feet.
- Damage to the Plant gate was discovered November 4. A police report was filed, repairs and corrective measures were made to the Plant gate. Security lighting will be added to the main and plant gates.
- Flow measurement devices were installed at the EPA VLT and Slot Ponds for testing purposes.

A BP affiliated company



October 2009 Activities - Continued

Other Site Activities

- Joe Sawyer (NDEP) on Site November 4 for a tour.
- Tri State Survey personnel were on Site November 9, 18 and 23 to confirm private property and proposed landfill site corners.
- Sierra Geosynthetic personnel were on Site November 24 to perform liner weld testing for pending repairs to the PWS evaporation pond south cell.
- Wayne Bull (GBI) was on Site the entire month to conduct daily monitoring of the ponds on behalf of USFWS.
- Tom Dunkelman (EPA) was on Site November 30 to assess wind damage to the bio-remediation cover.

Site Characterization

- Site-wide monthly groundwater elevation measurements were obtained on November 23-25.
- A pit lake water elevation of 4219.04 feet amsl was recorded on November 25, 2009 from the pressure transducer, an increase of 0.18 feet over a 30-day period (since October 25, 2009). The pit lake elevation has risen 3.08 feet since November 25, 2008.
- Conducted 3Q 2009 groundwater and domestic well monitoring November 8-19.
- Continued meteorological monitoring at the AM-6 location including wind speed/direction, temperature, relative humidity, barometric pressure, precipitation and solar radiation.
- Ongoing project database management including the submittal of the Access groundwater database to EPA and preparation for the revised domestic well sampling program.
- Submitted responses to EPA and YPT comments on the Conceptual Site Model on November 15.
- Continued compilation of groundwater monitoring data for inclusion in the 3Q 2009 Groundwater Monitoring Report and domestic well data for inclusion in the 3Q 2009 Domestic Well Monitoring Report.
- Continued to update the Draft Groundwater Monitoring Plan dated August 8, 2007 to incorporate current standard operating procedures (SOPs), and initiated the Draft Domestic Well Monitoring Plan including domestic well sampling SOPs.
- Continued the evaluation of groundwater data generated from the PWS Characterization Work Plan. Initiated responses to EPA comments on the Draft PWS Characterization Work Plan Addendum dated September 23, 2009 and the development of the Draft PWS Characterization Work Plan Addendum (Revision 1).
- Continued preparation of the Draft Process Areas Vadose Zone Characterization Work Plan.
- Continued Site wildlife surveys, maintenance of wildlife observation database and preparation of weekly wildlife observation report.

AOC Removal Actions

- Submitted the Draft Removal Action Implementation Work Plan to EPA on November 4 (the submittal included approximate 90 percent engineering design drawings). Submitted responses to EPA comments on the Draft XRF Work Plan and the XRF Work Plan (Revision 1) to EPA on November 13, which describes field screening of VLT materials in support of the evaporation ponds removal action.
- Continued to compile field and laboratory data for the field inspection, radiometric survey and sampling of pipe materials (validated radiochemical data was received November 17). Continued the preparation of the Draft Transite Pipe Removal Action Plan.
- Awarded the contract to PAR Electric to conduct the first phase of the electrical hazards removal action. Continued planning efforts with NV Energy to dismantle the 60 kV (5MW) substation as the second phase of the removal action.

Site Issues

- Non-Routine pumping continued from the Slot Pond leak detection sump at a rate of approximately 1.5 gallons per minute. An indication of the leak surfaced with the return of colder weather. Replaced the submersible pump on the Slot Pond on November 19.
- Continued planning for repairs of the liner for the South Cell of the PWS evaporation pond.

Planned December 2009/January 2010 Activities

- Continue routine O&M, site security, and bird deterrent activities. As requested, support USFWS inspection activities during work week business hours.
- Continue Site wildlife surveys, maintenance of wildlife observation database and preparation of wildlife observation reports.
- Continue to evaluate flow meters on a trial basis to assess their performance for the Arimetco FMS, and initiate a preliminary water balance calculation for the Arimetco FMS.
- Initiate the PWS well rehabilitation program.
- Initiate the repair of East Berm of South Cell PWS evaporation pond.
- Submit updated project schedules to EPA for RI/FS and removal action activities.
- Submit the 3Q 2009 Domestic Well Monitoring Report, including analytical results to EPA for distribution to well owners/residents (December), and submit the 3Q 2009 Groundwater Monitoring Report (January).
- By December 15, provide: 1) a list of domestic wells to be sampled under the revised domestic well monitoring program (DWMP) for EPA review; and 2) an Addendum to the Site-Wide QAPP that specifies QA/QC methods for the DWMP including sampling objectives, detailed sampling methods and protocols, analyte list, analytical methods and reporting limits.
- Compile data from the 4Q 2009 groundwater monitoring and domestic well sampling events.
- Continue groundwater elevation and pit lake level monitoring. Continue meteorological monitoring at AM-6.
- Respond to EPA comments on the Shallow Zone Characterization Data Summary Report
- Submit the PWS Characterization Work Plan Addendum (Revision 1). Pending EPA approval, conduct PWS well rehabilitation and initiate aquifer testing.
- Attend a groundwater technical meeting on December 10 to discuss the status of PWS characterization activities, the results of the Shallow Zone Characterization activities, and the elements to be included in a revised Site-Wide Groundwater Remedial Investigation Work Plan.
- Pending EPA concurrence, initiate preparation of the revised Groundwater RI Work Plan.
- Submit the Draft Transite Pipe Removal Action Plan, which includes transite pipe inspection and characterization activities (radiometric survey, laboratory asbestos and radiochemical analyses).
- Initiate the first phase of the electrical hazards removal action (electrical contractor to be on-Site December 10-15).
- As requested, pending final EPA sizing requirements, provide EPA with a landfill design for the placement of tires and administration building debris, as part of a removal action to be conducted by EPA.
- Discuss EPA comments to the Draft Process Areas Radiological Characterization Work Plan – Revision 1 and, upon receipt of comments, submit responses and a revised work plan.
- Upon receipt of revised EPA comments, provide responses to comments to the Draft Site O&M Plan and a revised O&M Plan.
- Submit the Draft Process Areas Vadose Zone and Groundwater Characterization Work Plan.
- Attend the Yerington Stakeholder's Meeting on January 7.

If you have any questions or comments, please feel free to contact me at (714) 228-6774 or via e-mail at jack.oman@bp.com.

Sincerely,

A handwritten signature in black ink, appearing to read "Jack Oman" with a stylized flourish at the end.

Jack Oman
Project Manager

cc: Dave Seter, EPA – via electronic mail
Mike Montgomery, EPA – via electronic mail
Roberta Blank, EPA – via electronic mail
Andrew Helmlinger, EPA – via electronic mail
Tom Dunkelman, EPA – via electronic mail
Joe Sawyer, NDEP – via electronic mail
Tom Olsen, BLM – via electronic mail
Dan Newell, City of Yerlington – via electronic mail
Phyllis Hunewill, Lyon County Commissioner – via electronic mail
Dennis Stark, Lyon County Manager – via electronic mail
Richard Faber, Lyon County Facilities Engineering – via electronic mail
Justin Whitesides, YPT – via electronic mail
Chairman Emm, YPT – via electronic mail
Dietrick McGinnis, McGinnis and Associates – via electronic mail
Chairman Reymus, WRPT – via electronic mail
Roxanne Ellingson, WRPT – via electronic mail
Ron Halsey, Atlantic Richfield Company - via electronic mail
James Lucari, Atlantic Richfield Company – via electronic mail
Roy Thun, Atlantic Richfield Company – via electronic mail
Don Pratt, Atlantic Richfield Company – via electronic mail
John Batchelder, EnviroSolve – via electronic mail
Jim Chatham, Atlantic Richfield Company – via electronic mail
Rich Curley, Curley and Associates, LLC – via electronic mail
Peggy Pauley, YCAG – via electronic mail
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